

ATTACHMENT G
CONTAINER MANAGEMENT

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TABLE NO.

G-1

TITLE

Use and Management of Containers Regulatory References
and Corresponding Permit Application Location

LIST OF FIGURES

<u>FIGURE NO.</u>	<u>TITLE</u>
G-1	Technical Area (TA) 50, Building 69, Container Storage Units

LIST OF ABBREVIATIONS/ACRONYMS

20.4.1 NMAC	New Mexico Administrative Code, Title 20, Chapter 4, Part 1
CAM	continuous air monitor
CSU	container storage unit
FRP	fiberglass-reinforced plywood
ft	feet/foot
LANL	Los Alamos National Laboratory
m ³	cubic meters
MDA	Material Disposal Area
ppmw	parts per million by weight
TA	Technical Area
TRU	transuranic
WCRRF	Waste Characterization, Reduction, and Repackaging Facility

ATTACHMENT G

CONTAINER MANAGEMENT

The information provided in this attachment is submitted to address the applicable container storage requirements of the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, 270.15, and 20.4.1 NMAC, Subpart V, Part 264, Subpart I , revised June 14, 2000 [6-14-00]. This attachment provides an overview of current facility operations and waste management practices for the Technical Area (TA) 50 container storage units at Los Alamos National Laboratory (LANL) and complements the information provided in Section 2.0 of this permit renewal application. It includes detailed descriptions of the TA-50 container storage units (CSUs) and the waste management practices associated with them. Table G-1 summarizes applicable regulatory references for container storage and the corresponding location where the requirements are addressed in this permit renewal application.

G.1 CONTAINER STORAGE

TA-50 is located at the northeast corner of the intersection of Pajarito Drive and Pecos Road, on the finger mesa bounded by Mortandad Canyon to the north and Two-Mile Canyon to the south. TA-50-69 is located in the southwest quadrant of TA-50 and was constructed in 1979 to house the Waste Characterization, Reduction, and Repackaging Facility (WCRRF) (formerly the Size Reduction Facility). The primary purpose of WCRRF was to size reduce large metallic items (e.g., glove boxes and other process equipment) that were transuric (TRU)-contaminated and repackage them into standard-sized containers capable for transportation and disposal at the Waste Isolation Pilot Plant. The facility was first used to size reduce mixed TRU waste in 1982. The original function of the WCRRF has since been expanded to include other activities related to hazardous and mixed waste management including waste characterization and experimental process demonstration support.

TA-50-69 is a single-story building constructed in two phases. The original structure (45 feet (ft) by 52 ft) was built in 1979, to house the main process room (Room 102) and personnel change rooms. An unloading area (Room 103) and a vehicle airlock entrance (Room 104) were added to the building in 1986. The dimensions of the 1986 addition are 20 ft by 36 ft. The longest dimension of the building is now 88 ft, and the building is oriented northwest-southeast. A mezzanine was also added in 1986 over the western third of the main process room. The exterior walls of TA-50-69 are load-bearing and constructed of structural steel framing with a plastic veneer finish on polystyrene insulation and gypsum wallboard. The interior walls are similarly constructed. The epoxy-painted floor of the building is a reinforced concrete slab on compacted fill. The CSUs at TA-50 include the TA-50-69, Indoor CSU

and the TA-50-69, Outdoor CSU.

G.1.1 TA-50-69, Indoor CSU

The TA-50-69, Indoor CSU consists of Rooms 102 and 103 as shown in Figure G-1. Room 102, the main process room, measures approximately 45 ft wide and 52 ft long. The long dimension is oriented northwest-southeast. Room 103, the unloading area, measures approximately 18 ft wide and 19 ft long and is located adjacent to and southeast of Room 102. A 12-ft by 20-ft roll-up vehicle access door is located at the southernmost end of Room 103, separating the unloading area (Room 103) from the vehicle airlock entrance (Room 104). This design allows for unobstructed transport of oversized fiberglass-reinforced plywood (FRP) boxes from outside the facility, through the vehicle airlock entrance, into the unloading area, and into the glove box cutting enclosure.

G.1.2 TA-50-69, Outdoor CSU

The TA-50-69, Outdoor CSU was constructed before 1980, and was first used to store mixed waste in 1982. It is located in the southwest corner of TA-50. The TA-50-69, Outdoor CSU (Figure G-1) asphalt pad is not lined or coated, and measures 24 ft wide and 90 ft long, with an additional strip 12 ft wide and 90 ft long added to the southeast end. The asphalt pad is approximately 4 in. thick. The long dimension of this CSU is oriented east-southeast. The pad slopes gently (approximately 1 to 5 percent) from west to east and up to 2.5 percent toward the centerline. Transportainers and other weather protective structures (i.e., containers covered with tarps, containers inside SWBs) within the TA-50-69, Outdoor CSU provide weather protection for containers of various sizes. Supplement 2-1 of this permit renewal application provides detailed information regarding standard transportainers. Painted lines are used to visually delineate the TA-50-69, Outdoor CSU boundary.

G.2 GENERAL FACILITY OPERATIONS AND WASTE MANAGEMENT PRACTICES

The following provides an overview of current facility operations and waste management practices that are applicable to the TA-50 CSUs. This overview includes a discussion of container handling and inspection; security and access control; preparedness and prevention; hazards prevention; special requirements for ignitable, reactive, or incompatible waste; and air emission standards for containers. This information is submitted to fulfill the requirements of 20.4.1 NMAC, Subpart V, Part 264, Subpart I [6-14-00]. Specific waste management practices and procedures detailed herein may be subject to change as a result of LANL safety and waste management policy changes.

G.2.1 Container Handling and Inspection

Handling and inspection requirements for containers stored within the TA-50 CSU are presented in Sections 2.1.5 and 2.1.7, respectively, of this permit renewal application. This information is provided to meet the requirements of 20.4.1 NMAC, Subpart V, 264.171, 264.173, and 264.174 [6-14-00].

G.2.2 Security and Access

Security at TA-50 is predominantly maintained with artificial barriers. These barriers prevent the unknowing entry and minimize the possibility for unauthorized entry of persons or livestock into the area and, thus, satisfy the requirements of 20.4.1 NMAC, Subpart V, 264.14(a) and (b)(2) [6-14-00]. An 8-ft high chain-link security fence surrounds the entire perimeter of TA-50. Bilingual (i.e., English and Spanish) warning signs are posted on the fences at approximately 50- to 75-ft intervals. In accordance with the requirements of 20.4.1 NMAC, Subpart V, 264.14(c) [6-14-00], warning signs are also posted at the entrances to each area that will manage hazardous and mixed waste and are visible from any approach to these areas. The legends on the posted signs indicate "Danger?Hazardous Waste Storage Area" and "Unauthorized Persons Keep Out." The signs are legible from a distance of 25 ft. Additionally, signs will be posted at the entrance to each hazardous and mixed waste management area to address requirements associated with entering and working in the area.

There are four entry gates into TA-50. Two entry gates are located north of TA-50-1. During normal business hours, the easternmost of these two gates may remain open to receive deliveries. After normal business hours, this gate is padlocked. The westernmost of these two gates is the main access gate and remains open during normal business hours for personal and government-owned passenger vehicles. After normal business hours, access through this gate is by badge-reader only. A fire access and shipping gate is located west of TA-50-69 and is routinely kept closed and locked. When this gate is opened for shipments of materials or waste, facility personnel are present in the yard west of TA-50-69 to limit egress by unauthorized persons. A fourth gate to the south of TA-50-1 is locked except when authorized access is necessary. TA-50 is patrolled by Protection Technology Los Alamos security personnel during non-operational hours to ensure that unauthorized entry has not occurred. In accordance with 20.4.1 NMAC, Subpart IX, 270.14(b)(19)(viii) [6-14-00], the locations of the security fences and entry gates at TA-50 are shown on Figure A-10.

TA-50-69 is always locked and access is gained by a badge reader. Doors to the building and transportainers are locked. Keys to these doors are distributed to designated personnel only. Building access also limits access to the Indoor CSU. Access to the TA-50-69, Outdoor CSU is controlled by a chain around the CSU and a posted sign that indicates "Authorized Personnel Only."

G.2.3 Preparedness and Prevention

The following sections present how waste management operations at TA-50 comply with the preparedness and prevention requirements of 20.4.1 NMAC, Subpart V, Part 264, Subpart C [6-14-00]. Additional information on the communication and alarm equipment available at LANL is presented in Appendix E of the "Los Alamos National Laboratory General Part B Permit Application," Revision 1.0 (LANL, 1998), hereinafter referred to as the LANL General Part B. A list of the emergency equipment available for use at the TA-50 CSUs is provided as Table E-1 of Attachment E of this document and in Table E-2 of the LANL General Part B.

G.2.3.1 Required Equipment [20.4.1 NMAC, Subpart V, 264.32]

All personnel involved in waste management activities at the TA-50 CSUs have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another individual in accordance with 20.4.1 NMAC, Subpart V, 264.34 [6-14-00]. In the event of an emergency, this communication equipment will allow personnel to contact the operating group management, the Emergency Management and Response Office, and/or the Central Alarm Station operator.

TA-50-69 is equipped with an audible alarm system to alert personnel to evacuate the area. The alarm system may be activated by one of the fire alarm pull stations located throughout the building. TA-50-69 also has a public address system for announcing fires or evacuations and telephones with paging capabilities. Paging telephones are used to page on-site personnel and may be used in the event of an emergency to communicate the location and nature of hazardous conditions to personnel in the area. The alarm system is interrupted when the paging telephone system is activated to allow personnel to hear the announcement. Personnel can also use these phones to summon assistance from local emergency response teams in case of emergency. Personnel may carry pagers, two-way radios, and/or cellular telephones so they can contact or be contacted by on-site and LANL emergency support personnel at all times.

TA-50-69 is equipped with fire extinguishers and fire suppression systems. Depending on the size of a fire and the fuel source, fire extinguishers may be used by on-site personnel. However, LANL policy encourages immediate evacuation of the area and notification of appropriate emergency personnel. The fire alarm control panel continuously monitors all fire suppression and detection systems and transmits signals to the Los Alamos County Fire Department through LANL central alarm system.

A fire hydrant installed according to National Fire Protection Association standards is located approximately 55 ft west of TA-50-69. Water is supplied to the fire hydrant by a municipal water system

through 8 inch pipes at an adequate volume and pressure (i.e., 200 gallons per minute and 90 pounds per square inch static pressure) to supply a water hose in the event of a fire.

TA-50-69 has an automatic wet-pipe sprinkler system in the main building and in the large glove box enclosure. The sprinkler system is heat-activated at 100°C (212°F). The TA-50-69, Outdoor CSU transportainers and weather protective structures are not equipped with automatic sprinkler systems, but are provided with a fire extinguisher located within 20-ft of the CSU. Personnel may use the fire alarm pull station at TA-50-69 in the event of a fire at both the Indoor and Outdoor CSUs.

Two spill centers are located in TA-50-69 in Room 102. They contain spill control equipment, personal protective equipment, and sorbents. Trained personnel may use this equipment to mitigate small containable spills when they are certain their actions will not put themselves or others at risk. EM&R provides additional spill control equipment and assistance upon request and depending on the size and severity of the spill. Personnel decontamination equipment available includes safety showers and eye wash stations located at TA-50-69. Material safety data sheets located at all operations areas provide useful exposure information.

G.2.3.2 Testing and Maintenance of Equipment [20.4.1 NMAC, Subpart V, 264.33]

The communication, alarm systems, fire protection, spill control, and decontamination equipment described above are tested and/or maintained according to the inspection schedule provided in Appendix C of the LANL General Part B (LANL, 1998). The frequency of inspection is adequate to ensure proper operation in the event of an emergency. Repair and replacement of emergency equipment is performed as required.

G.2.3.3 Access to Communications or Alarm System

Whenever waste is being handled at the TA-50 CSUs, all personnel involved have immediate access to internal alarms or telephones either directly or through visual or voice contact with another individual. In the event of an emergency, communication equipment allows personnel to contact the operating group management, the Emergency Management and Response Office, and/or the Central Alarm Station operator. In addition to the communications and alarm systems described in Section G.2.3.1, on-site personnel may carry pagers so that they can be contacted on-site and LANL emergency support personnel at all times.

G.2.3.4 Aisle Space and Storage Configuration

Information on aisle space and storage configurations for the TA-50 CSUs is presented in Section 2.1.3 of this permit renewal application. This information is provided to meet the requirements of 20.4.1 NMAC, Subpart V, 264.35 [6-14-00].

G.2.3.5 Support Agreements with Outside Agencies

LANL maintains support agreements and contracts with outside agencies for emergency response assistance. Information regarding these contracts and support agreements is provided in Section 2.1.2.4 of the LANL General Part B (LANL, 1998).

G.2.4 Hazards Prevention [20.4.1 NMAC, Subpart IX, 270.14(b)(8) and 20.4.1 NMAC, Subpart V, Part 264 Subpart C]

In accordance with 20.4.1 NMAC, Subpart V, Part 264, Subpart C and 20.4.1 NMAC, Subpart IX, 270.14(b)(8) [6-14-00], the TA-50 CSUs addressed in this TA-50 Part B are designed and operated to minimize the possibility of fire, explosion, or unplanned releases of hazardous constituents to any environmental medium. The following sections describe the general preventive procedures, structures, and equipment at the TA-50 CSUs to meet these requirements. Adherence to the procedures and proper use of the structures and equipment will help to prevent hazards and exposure to personnel and releases to the environment.

G.2.4.1 Preventing Hazards in Unloading

TA-50 personnel will use proper handling equipment, appropriate to a container's size and weight, to help prevent hazards while moving containers within the CSUs. Flatbed trucks or trailers will be used to transport containers to TA-50-69 for storage and processing. A forklift will be used to move containers at the TA-50-69, Outdoor CSU, from outside the building into the TA-50-69 airlock, and then within the TA-50-69, Indoor CSU. FRP boxes and palletized drums will be handled with a forklift equipped with tines. Individual drums of waste will be manipulated with a drum-grapple attachment on the forklift. Small containers may be handled manually or with a dolly. Inside TA-50-69, two cranes are available to move heavy objects. Load limits are restricted to the rated capacity of these cranes for safe operation. All damaged containers (e.g., severely corroded drums) will be repaired or overpacked, or the wastes repackaged in new containers before being staged at the CSUs.

Waste management personnel at TA-50 do not perform loading/unloading operations during precipitation events. The waste stored in the TA-50 CSUs is Waste Isolation Pilot Plant-certifiable and does not contain free liquids; therefore, if a drum is opened and the contents spilled, it is easily contained. In the case of spills, on-site personnel follow site procedures, emergency response plans,

and implement the LANL Contingency Plan, if necessary. Because the waste does not contain free liquids, secondary containment and temporary berms are not necessary during loading/unloading operations.

G.2.4.2 Runoff and Runon Controls [20.4.1 NMAC, Subpart V, 264.31 and 264.175(b); and 20.4.1 NMAC, Subpart IX, 270.15(a)(4) and (5)]

Runoff from the TA-50 CSUs to other areas or to the environment will be prevented. Engineered surfaces/structures or secondary containment pallets/devices are provided for potential liquid-bearing containers. All secondary containment systems are sufficient to contain at least 10 percent of the volume of potential liquid-bearing containers or the volume of the largest container, whichever is greater, in accordance with the requirements of 20.4.1 NMAC, Subpart V, 264.175(b)(3) [6-14-00].

As a practice at TA-50, runoff and erosion controls are designed to guide surface water away from waste management activities and into the natural drainages. Storm water feeds into Mortandad Canyon and is managed according to the Clean Water Act. Liquids that may accumulate in the self-containment pallets as a result of leaks or spills will be collected into a container using a portable pump and/or sorbents, depending on the volume of accumulated liquid. Accumulated liquids will be removed as soon as possible and sampled in accordance with Appendix E of the LANL General Part B (LANL, 1998).

G.2.4.2.1 TA-50-69, Indoor CSU

Run-on into the TA-50-69, Indoor CSU from outdoors is not likely to occur due to positive surface drainage that directs potential run-on away from the building. Figure A-11 (Attachment A) provides the contours and surface drainage around TA-50. The northern and eastern portions of TA-50 drain mainly to an unlined channel on the boundary between TA-50 and TA-35 (east of TA-50), although some flow diverges into a shallow channel running southward between TA-50-37 and TA-50-1.

To meet the requirements of 20.4.1 NMAC, Subpart IX, 270.15(a)(5) [6-14-00], any liquids that may accumulate within the self-containment pallets or devices, trenches and pits, or glove box enclosure will be removed as soon as possible to prevent overflow. The accumulated liquid will be sampled and analyzed. Depending upon the volume of the accumulated liquid, a high-efficiency particulate air vacuum, portable pump, universal sorbents, and/or other methods suitable for retrieval will be used to remove the liquid. Accumulated liquids are removed as soon as possible. The collected liquids and/or sorbents will be transferred to compatible containers, which will be stored temporarily at the respective CSU pending sample analysis, which will dictate how the wastes will be managed. Should a spill occur during waste handling activities, the spill and/or residual material will be sampled and managed in accordance with Appendix E of the LANL General Part B (LANL, 1998).

G.2.4.2.2 TA-50-69, Outdoor CSU

Run-on into the TA-50-69, Outdoor CSU is prevented because the CSU is elevated by design. The TA-50-69, Outdoor CSU is sloped sufficiently to prevent the accumulation of precipitation. In addition, drainage swales located in the vicinity, divert storm water away from the pad. One drainage swale is located just south of the CSU, between it and the material disposal area (MDA)-C. A second drainage swale is located on the west side of the CSU between Pecos Drive and the TA-50 fence line. Inspections of TA-50 waste management facilities, areas that may be prone to soil erosion, and drainage control structures are conducted as described in the "Storm Water Pollution Prevention Plan for Technical Area 50 Waste Treatment Facilities" (LANL, 1993). Together, the containment design and operations meet the requirements of 20.4.1 NMAC, Subpart V, 264.175(b), and 20.4.1 NMAC, Subpart IX, 270.15(a)(4) [6-14-00].

G.2.4.3 Preventing Water Supply Contamination [20.4.1 NMAC, Subpart V, 264.31]

It is not anticipated that there will be any impact to groundwater or other water supplies as a result of waste-handling operations at TA-50 CSUs. The TA-50-69, Indoor CSU is located inside a building. Any material spilled during waste management activities are immediately remediated pursuant to Appendix E of the LANL General Part B (LANL, 1998). All water supply lines at TA-50 are under pressure and are equipped with backflow prevention devices to prevent contamination of these lines during emergencies. Therefore, no impact to water supplies is expected. The depth to groundwater at TA-50 is approximately 1,000 ft (Purtymun and Johansen, 1974). Geologic units underlying TA-54 (located 4 miles east of TA-50) include layers of unsaturated volcanic tuff and ash, the moisture content of which ranges from 0.2 to 2.0 percent by weight (IT Corporation, 1987).

G.2.4.4 Mitigating Effects of Power Outages [20.4.1 NMAC, Subpart IX, 270.14(b)(8)]

Electrical power is supplied to TA-50-69 by a 13.4-kilovolt overhead distribution line through an underground conduit to an on-site substation that provides distribution to the building. Supplied power is used to operate continuous air monitors (CAMs) and other electrical equipment in the buildings. Additionally, an uninterruptible power source has been installed to operate the CAMs in the event of a power outage. In the event of a power failure, operations would cease and personnel would exit the affected building. Operations at the CSUs will be discontinued temporarily if electrical power is not restored quickly. A power failure or equipment failure would not affect containment within the TA-50 CSUs.

G.2.4.5 Preventing Undue Exposure [20.4.1 NMAC, Subpart V, 264.32]

To prevent undue exposure of personnel to hazardous or mixed waste, personal protective equipment appropriate for the waste being handled is worn by all on-site personnel at TA-50 involved in waste management activities at any of the waste management units. Workers involved in waste handling at TA-50 are required to wear protective work uniforms and steel-toed /composite-toed shoes, as appropriate. Hard hats and gloves may also be worn while equipment is being operated and when containers are being loaded or unloaded.

G.2.4.6 Air Emission Standards [20.4.1 NMAC, Subpart V, 264.31 and 264.179]

Releases to the atmosphere are not anticipated from any of the TA-50 CSUs. Containers are kept closed during handling and storage except when, upon inspection, it is determined that containers need to be overpacked or the contents repackaged in new containers or when it is necessary to add or remove waste. Inspections are conducted to ensure the integrity of all stored containers. In the event of an unexpected release, all personnel working within or near the area would be notified immediately to evacuate.

G.2.5 Ignitable, Reactive, or Incompatible Waste [20.4.1 NMAC, Subpart IX, 270.14(b)(9) and 270.15(c) and (d); and 20.4.1 NMAC, Subpart V, 264.17, 264.176, and 264.177]

Special requirements for ignitable, reactive, or incompatible waste at the TA-50 CSUs is presented in Section 2.1.8 of this permit renewal application. This information is provided to meet the requirements of 20.4.1 NMAC, Subpart V, 264.17(a), 264.176, and 264.177(a)(b)(c); and 20.4.1 NMAC, Subpart IX, 270.14(b)(9) and 270.15(d) [6-14-00].

G.2.6 Air Emission Standards for Containers [20.4.1 NMAC, Subpart V, Part 264, Subpart CC]

This section addresses potential applicability of 20.4.1 NMAC, Subpart V, Part 264, Subpart CC [6-14-00], "Air Emission Standards for Tanks, Surface Impoundments, and Containers" to containers at TA-50, based on applicability criteria specified in 20.4.1 NMAC, Subpart V, 264.1080 [6-14-00]. Subpart CC standards require that the containers be covered or controlled so that there are no detectable emissions. The standards are met by placement of waste in DOT-compliant containers and are not applicable to containers of radioactive mixed waste. The standards are also not applicable to containers of hazardous waste with less than 500 parts per million by weight (ppmw) volatile organics, containers that have received waste prior to the effective date of regulation (December 6, 1996), or containers of less than 0.1 cubic meters (m³) (approximately 26 gallon) capacity.

Containers of less than 0.46 m³ (approximately 119 gallon) capacity and that meet DOT specifications under the Code of Federal Regulations, Title 49, Part 178, will be kept closed during storage pursuant to 20.4.1 NMAC, Subpart V, 264.1086(b)(1)(ii) [6-14-00]. Containers undergoing waste characterization activities may be open for access for the purposes described in 20.4.1 NMAC, Subpart V, 264.1086(c) [6-14-00]. Containers of greater than 0.46 m³ capacity that contain waste with greater than 500 ppmw volatile organics or those that are greater than 0.1 m³ capacity, do not meet U.S. Department of Energy specifications, and contain wastes of greater than 500 ppmw volatile organics will be subject to a visual inspection and monitoring program as required by 20.4.1 NMAC, Subpart V, 264.1088(b) [6-14-00].

G.3 REFERENCES

IT Corporation, 1987, "Hydrogeologic Assessment of Technical Area 54, Areas G and L," Los Alamos National Laboratory, Docket No. NMHWA 001007, IT Corporation, Albuquerque, New Mexico.

LANL, 1993, "Storm Water Pollution Prevention Plan for Technical Area 50 Waste Treatment Facilities," Los Alamos, New Mexico, Los Alamos National Laboratory.

LANL, 1998, "Los Alamos National Laboratory General Part B Permit Application," Los Alamos, New Mexico, Los Alamos National Laboratory.

Purtymun and Johansen, 1974, "General Geohydrology of the Pajarito Plateau," New Mexico Geological Society Guidebook, 25th Field Conference, Central Northern New Mexico.

Table G-1

**Use and Management of Containers
Regulatory References and Corresponding Permit Application Location**

Regulatory Citation(s)	Description of Requirement	Location in this Permit Application
§270.15	Specific information requirements for containers:	G.0
§270.15(a)	A description of the containment system to demonstrate compliance with §264.175 including at a minimum:	G.2
§270.15(a)(1)	Basic design parameters, dimensions, and materials of construction	G.1
§270.15(a)(2)	How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system	G.2
§270.15(a)(3)	Capacity of the containment system relative to the number and volume of containers to be stored	G.2
§270.15(a)(4)	Provisions for preventing or managing run-on	G.2
§270.15(a)(5)	How accumulated liquids can be analyzed and removed to prevent overflow	G.2
§270.15(b)	For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with §264.175(c) including:	G.2
§270.15(b)(1)	Test procedures and results or other documentation or information to show that the wastes do not contain free liquids	G.2
§270.15(b)(2)	A description of how the storage area is designed or operated to drain and remove liquids or how containers are kept from contact with standing liquids	G.2
§270.15(c)	Sketches, drawings, or data demonstrating compliance with §264.176 (location of buffer zone and containers holding ignitable or reactive wastes) and §264.177(c) (location of incompatible wastes), where applicable	1.0
§270.15(d)	Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with §264.177(a) and (b) and §264.17(b) and (c)	G.3
§270.15(e)	Information on air emission control equipment as required in §270.27	G.4
§270.27(a)	Specific information requirements for air emission controls	G.4
§270.27(a)(2)	Identification of each container area subject to the requirements of §264, Subpart CC and certification by the owner or operator that the requirements are met	G.4

Table G-1 (Continued)

**Use and Management of Containers
Regulatory References and Corresponding Permit Application Location**

Regulatory Citation(s)	Description of Requirement	Location in this Permit Application
§270.27(a)(3)	Documentation that each enclosure used to control air emissions from containers are in accordance with the requirements of §264.1086(b)(2)(I) includes information prepared by the owner or operator or manufacturer or vendor describing the enclosure design and certification that the enclosure meets the specifications listed in §265.1087(b)(2)(ii)	NA ^a
§270.27(a)(5)	Documentation for each closed-vent system and control device installed in accordance with the requirements of §264.1087 that includes design and performance information as specified in §270.24 (c) and (d)	NA
§270.27(a)(6)	An emission monitoring plan for both Method 21 and control device monitoring methods. The plan must include:	NA
§270.27(a)(7)	Implementation schedule	NA

^a NA= not applicable

Table G-1

**Use and Management of Containers
Regulatory References and Corresponding Permit Application Location**

Regulatory Citation(s)	Description of Requirement	Location in this Permit Application
§270.15	Specific information requirements for containers:	G.0
§270.15(a)	A description of the containment system to demonstrate compliance with §264.175 including at a minimum:	G.2
§270.15(a)(1)	Basic design parameters, dimensions, and materials of construction	G.1
§270.15(a)(2)	How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system	G.2
§270.15(a)(3)	Capacity of the containment system relative to the number and volume of containers to be stored	2.0, G.2
§270.15(a)(4)	Provisions for preventing or managing run-on	2.0, G.2
§270.15(a)(5)	How accumulated liquids can be analyzed and removed to prevent overflow	G.2
§270.15(b)	For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with §264.175(c) including:	G.2
§270.15(b)(1)	Test procedures and results or other documentation or information to show that the wastes do not contain free liquids	G.2
§270.15(b)(2)	A description of how the storage area is designed or operated to drain and remove liquids or how containers are kept from contact with standing liquids	G.2
§270.15(c)	Sketches, drawings, or data demonstrating compliance with §264.176 (location of buffer zone and containers holding ignitable or reactive wastes) and §264.177(c) (location of incompatible wastes), where applicable	2.1.10
§270.15(d)	Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with §264.177(a) and (b) and §264.17(b) and (c)	G.2.5
§270.15(e)	Information on air emission control equipment as required in §270.27	G.2.6
§270.27(a)	Specific information requirements for air emission controls	G.2.6
§270.27(a)(2)	Identification of each container area subject to the requirements of §264, Subpart CC and certification by the owner or operator that the requirements are met	G.2.6

Table G-1 (Continued)

**Use and Management of Containers
Regulatory References and Corresponding Permit Application Location**

Regulatory Citation(s)	Description of Requirement	Location in this Permit Application
§270.27(a)(3)	Documentation that each enclosure used to control air emissions from containers are in accordance with the requirements of §264.1086(b)(2)(I) includes information prepared by the owner or operator or manufacturer or vendor describing the enclosure design and certification that the enclosure meets the specifications listed in §265.1087(b)(2)(ii)	NA ^a
§270.27(a)(5)	Documentation for each closed-vent system and control device installed in accordance with the requirements of §264.1087 that includes design and performance information as specified in §270.24 (c) and (d)	NA
§270.27(a)(6)	An emission monitoring plan for both Method 21 and control device monitoring methods. The plan must include:	NA
§270.27(a)(7)	Implementation schedule	NA

^a NA= not applicable